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5 *Attorneys for Plaintiff Geoff Winkler,*
6 *as Receiver for Profit Connect*

7 UNITED STATES DISTRICT COURT
8 DISTRICT OF NEVADA

9 GEOFF WINKLER, as Receiver for
PROFIT CONNECT WEALTH
10 SERVICES, INC.,

11 Plaintiff,

12 v.

13 WILLIAM ROSHAK, individually and
d/b/a WILLIAM GEORGE
14 PHOTOGRAPHY, MELISSA ROSHAK,
TETIANA LUZHANSKA, DOES 1-10 and
15 ROES 1-10;

16 Defendants,

17 and

18 TINA M. LEISS, as Executive Officer of
the Public Employee's Retirement
19 System of Nevada,

20 Nominal Defendant.

Case No. 2:21-cv-002000-JCM-EJY

**STIPULATION FOR EXTENSION OF
TIME FOR DEFENDANT MELISSA
ROSHAK TO RESPOND TO
COMPLAINT (ECF No. 1)**

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22 Plaintiff Geoff Winkler, as Receiver for Profit Connect Wealth Services, Inc.
23 and any of its subsidiaries and affiliates, and Defendant Melissa Roshak stipulate
24 and agree that Ms. Roshak has up to and including December 31, 2021 to respond to
25 the Complaint (ECF No. 1), so that Ms. Roshak may further investigate the claims in
26 the Complaint and the parties may try to enter into an early resolution of those
27 claims. Ms. Roshak was served on November 9, 2021, and the current deadline to file
28 a response is November 30, 2021. Therefore, pursuant to LR IA 6-1, this stipulation
is timely.

1 This is the first request for an extension, and it is made in good faith and not
2 for purposes of delay.

3 Dated: November 15, 2021

4 BALLARD SPAHR LLP

KELLEHER & KELLEHER, LLC

5 By: /s/ Maria Gall

By: /s/ John Kelleher

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9 *Attorneys for Plaintiff Geoff Winkler, as
Receiver of Profit Connect*

*Attorneys for Defendant
Melissa Roshak*

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16 **ORDER**

17 IT IS SO ORDERED:

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19 UNITED STATES MAGISTRATE JUDGE

20 DATED: November 16, 2021
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